



SUBJECT TO ATTORNEY-CLIENT PRIVILEGE
AND ATTORNEY WORK PRODUCT

INVOICE

Ad Hoc Group of Celsius Earn Account Holders

Fees	62,413.00
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Invoice Total	62,413.00
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INVOICE DETAILS

DETAIL OF CURRENT CHARGES

<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hrs</u>	<u>Amount</u>
10/2/2023	Prep for and finalize opening statement approvals (2.0); attend confirmation hearing and present at opening (3.0)	Joyce A. Kuhns	530	5	2,650.00
10/3/2023	Attend confirmation hearing	Joyce A. Kuhns	530	6.5	3,445.00
10/10/2023	Email to Kirkland re voting/toggle issues (.2); review response and forward reply to Ad Hoc members (.2)	Joyce A. Kuhns	530	0.4	212.00
10/16/2023	Attend confirmation hearing via zoom	Joyce A. Kuhns	530	4	2,120.00
10/26/2023	Review demonstratives for 10/30 (.6); draft and file closing statement requests letter (.2); send invite to C. Koenig and A. Colodny re coordinating closing statement (.2); redline Litigation Administrator Agreement for G. Pesce (1.0)	Joyce A. Kuhns	530	2	1,060.00
10/27/2023	Review recent docket submissions re confirmation including Seventh Plan Supplement (1.2); emails with Ad Hoc re Litigation Administrator Agreement changes and approvals (.8); call with C. Koenig, A. Kolodny and J. Nagi re closing statement and LAA (1.0)	Joyce A. Kuhns	530	3	1,590.00
10/28/2023	Emails with G. Pesce re LAA changes (.5); forward suggested language change re compensation (.2); emails and call to D. Adler re same (.4); emails with Ad Hoc re same (.4); review open confirmation objections (.5)	Joyce A. Kuhns	530	2	1,060.00
10/30/2023	Review revised Litigation Administrator Agreement (1.0); review and revise closing statements (1.0); Attend closing of confirmation hearing and present closing statement (3.0)	Joyce A. Kuhns	530	5	2,650.00
11/16/2023	Emails from D. Latona and request for call re SEC position on NewCo	Joyce A. Kuhns	530	0.2	106.00
11/17/2023	Call with counsel for Debtor, Committee, et al. re SEC decision and impact (1.0); follow on emails with Earn constituents (.3)	Joyce A. Kuhns	530	1.3	689.00
11/21/2023	Call with Ad Hoc re implications of SEC decision re NewCo assets (1.0); review plan re OWD (1.0); emails with Celsius and Committee counsel re same (.3); call with J. Sabin re same (.3)	Joyce A. Kuhns	530	2.6	1,378.00
11/22/2023	Review plan re modification issues and illiquid assets and resolicitation issues	Joyce A. Kuhns	530	1	530.00
11/27/2023	Follow on emails with Ad Hoc re OWD status	Joyce A. Kuhns	530	0.3	159.00
11/28/2023	Emails with d. Latona re Coinbase handling business account distributions in US	Joyce A. Kuhns	530	0.2	106.00
11/29/2023	Call with A. Colodny, et al. re Debtor and UCC updates re OWD (1.0); emails with Ad Hoc Group re issues and concerns and set up call (1.0)	Joyce A. Kuhns	530	2	1,060.00
11/29/2023	Call with Debtors and Committee concerning wind-down option (1.0); consider issues with suggestions discussed (.3)	Jason A. Nagi	550	1.3	715.00

<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hrs</u>	<u>Amount</u>
11/30/2023	Review motion to implement MiningCo transaction and declarations (1.0); attend 11/30 hearing (1.3); pull NewCo and OWD comparison chart and materials from Plan and Disclosure Statement and circulate to Ad Hoc with comments (1.0); call with J. Nagi re same in prep for call (.4); call with Ad Hoc re same (1.0); collate questions for Debtors and Committee (1.0); email to A. Colodny re setting up call re same (.2)	Joyce A. Kuhns	530	5.9	3,127.00
11/30/2023	Attend court conference based on Debtor's motion for an orderly wind-down (1.0); review plan chart re orderly wind down and Campagna declaration with chart supporting motion to approve orderly wind down and clarification and resolicitation issues and caselaw (1.5); call with Earn Ad Hoc group re same (1.0)	Jason A. Nagi	550	3.5	1,925.00
12/1/2023	Collect comments from Ad Hoc re MiningCo and toggle (1.0); call with A. Colodny and Steering Committee and T. DeFiore re same (1.0)	Joyce A. Kuhns	530	2	1,060.00
12/4/2023	Call between Committee and Ad Hoc Steering Committee re Motion to implement MiningCo Transaction issues (1.0); follow on call with Steering Committee re same (.5)	Joyce A. Kuhns	530	1.5	795.00
12/4/2023	Telephone call with A. Colodny of Committee and Earn Ad Hoc group re wind down issues (1.0); telephone call with Earn Group re same (.5)	Jason A. Nagi	550	1.5	825.00
12/5/2023	Emails with A. Colodny clarifying open issues raised on Ad Hoc Steering Committee call with Committee and counsel (.5); follow on with group re replies (.3)	Joyce A. Kuhns	530	0.8	424.00
12/6/2023	Research and prepare memorandum re case law re materially adverse modifications/clarifications	Leslie R. Horowitz	570	4.8	2,736.00
12/6/2023	Call with A. Colodny re open ad hoc issues re motion to implement MiningCo transaction	Joyce A. Kuhns	530	0.5	265.00
12/7/2023	Analysis of issues related to toggle and implementation versus modification	Jason A. Nagi	550	1	550.00
12/7/2023	Commence drafting statement of position on MiningCo transaction	Joyce A. Kuhns	530	1.5	795.00
12/8/2023	Review section 1127 cases (1.0); review DS and plan section re OWD (1.0); revise Statement of Position and add reservation of rights (1.5); compile additional questions and forward for Committee comment (.5)	Joyce A. Kuhns	530	4	2,120.00
12/11/2023	Call with A. Colodny re BRIC status (.8); Earn Ad Hoc call re BRIC and possible settlement and open MiningCo questions (1.2)	Joyce A. Kuhns	530	2	1,060.00
12/11/2023	Call with Earn Ad Hoc Group re position on Debtors' motion to toggle, litigation issues with BRIC an appropriateness of BRIC's attempt to hold up plan exit and reservation of rights supporting plan exit.	Jason A. Nagi	550	1.2	660.00

<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hrs</u>	<u>Amount</u>
12/12/2023	Review statement supporting plan exit and reservation of rights.	Jason A. Nagi	550	0.5	275.00
12/12/2023	Review all docs and dictate preliminary statement of position (2.0); email and call with A. Colodny re BRIC position (.3)	Joyce A. Kuhns	530	2.3	1,219.00
12/13/2023	Modify Ad Hoc statement in support of exit (.5); call with A. Colodny re BRIC status (.5)	Joyce A. Kuhns	530	1	530.00
12/14/2023	Call with Earn Ad Hoc re BRIC settlement and objections (1.2); revise and finalize and forward final Ad Hoc Statement for comment (revised per BRIC proposed settlement) (.5); review objections of pro ses and ROR of SEC (.5); collate comments, and revise, finalize and file and serve same (1.5)	Joyce A. Kuhns	530	3.7	1,961.00
12/15/2023	Review Borrower Ad Hoc Objection to MiningCo Transaction motion (.5); email to D. Adler to set up call to discuss same (.2); review Fireblocks objection to StakeHound settlement motion (.5); emails with A. Colodny re proposed BRIC settlement (.3); call with A. Colodny and J. Sabin re proposed BRIC settlement and open issues (1.0) ; summary to Ad Hoc re same (.5)	Joyce A. Kuhns	530	3	1,590.00
12/18/2023	Call with D. Adler and J. Sabin re borrower position on OWD (.5); call with A. Colodny and J. Sabin re same (.6); review Tuganov proposed statement in support (.3); emails with Steering Committee re same and re state of play with Borrower Ad Hoc (.5)	Joyce A. Kuhns	530	1.9	1,007.00
12/19/2023	Follow on emails with A. Colodny re recapitalization issues and reply (.5); exchange emails with Earn Ad Hoc re same (1.0); review and forward to Earn Ad Hoc Borrower Ad Hoc supplemental objection (.5); request for pro se letters of support for OWD/MiningCo Motion (.2)	Joyce A. Kuhns	530	2.2	1,696.00
12/20/2023	Review Motion to Implement MiningCo Transaction, Objections and Replies and outline position statement (2.0); review StakeHound settlement motion and objection (1.0); call with K. Wofford and J. Sabin re Committee request for support (1.0); email to Ad Hoc Group re Stakehound settlement terms (.5); obtain approvals from Ad Hoc to join Tuganov support papers re Motion for implementation and Statement in Support of Stakehound Settlement (.5.); review Debtors' just filed reply to Objections to same (.5); draft, file and serve reply and joinder (.9)	Joyce A. Kuhns	530	6.4	3,392.00
12/21/2023	Attend hearing on StakeHound settlement and Motion to Approve Implementation of MiningCo Transaction (5.0); status email to Ad Hoc (.3)	Joyce A. Kuhns	530	5.3	2,809.00
12/27/2023	Review order approving implementation of MiningCo Transaction and memorandum opinion re same	Joyce A. Kuhns	530	1	530.00
1/2/2024	Status email to Ad Hoc and gather comments for status call with counsel for Debtors and Committee	Joyce A. Kuhns	585	1	585.00
1/3/2024	Status call with C. Koenig, A. Colodny, K. Wofford, J. Sabin, and	Joyce A. Kuhns	585	1	585.00

A. Rudolph (.5); follow on email update to Ad hoc and questions re custody distributions (.5)

<u>Date</u>	<u>Services</u>	<u>Timekeeper</u>	<u>Rate</u>	<u>Hrs</u>	<u>Amount</u>
1/9/2024	Respond to agenda question from Kirkland for 1/11 hearing.	Joyce A. Kuhns	585	0.2	117.00
1/12/2024	Follow on emails to Ad Hoc re distribution issues (.3); review and send corrections to 1/11 transcript to Kirkland (.7)	Joyce A. Kuhns	585	1	585.00
1/16/2024	Gather proposed FAQ questions from Ad Hoc and forward to Celsius (1.0); replies from Celsius forwarded to Ad Hoc (.5)	Joyce A. Kuhns	585	1.5	877.50
1/17/2024	Email to counsel re possible sale of stock option	Joyce A. Kuhns	585	0.3	175.50
1/18/2024	Review plan articles re distributions and proposed FAQ to prep for Celsius call re FAQ's.	Joyce A. Kuhns	585	1	585.00
1/19/2024	Status call re distributions and effective date issues with C. Koenig, A. Colodny, and J. Sabin (.5); emails to Ad Hoc re distribution allocation preferences (.3); status email to Ad Hoc re stock and Effective Date issues (.4); email with C. Koenig to confirm no fee for crypto allocation (.2); call with A. Colodny to confirm no crypto valuation date yet (.2); further emails and confirmations through evening re allocations and collate creditor inquiries and forward and monitor replies from Kirkland re distribution questions and allocations (3.0)	Joyce A. Kuhns	585	4.6	2,691.00
1/19/2024	Analysis of requirements for substantial consummation, payment of liquid crypto and distribution of stock in MiningCo (1.0); call with C. Koenig and A. Colodny concerning effective date payments, percentage of claim to be provided in crypto vs. MiningCo stock, confirmation re distribution of MiningCo stock (.6)	Jason A. Nagi	605	1.6	936.00
1/22/2024	Call with B. Perry and J. Lehrfeld re board issues (1.0); email to K. Wofford, G. Pesce and call re same (.6); collate distribution questions from creditors and forward to C. Koenig (1.0)	Joyce A. Kuhns	585	2.6	1,521.00
1/23/2024	Further call with G. Pesce and K. Wofford re status of board observer agreements and LOC (.4); emails with B. Perry and J. Lehrfeld re Board observer notice and reply to White and Case re same (.4); respond to creditor inquiries and forward same to Kirkland re distribution issues (.5)	Joyce A. Kuhns	585	1.3	760.50
1/26/2024	Attend effective date call with C. Koenig, A. Colodny and J. Sabin (.6); review Board Observer draft and send questions to White and Case re same (.4)	Joyce A. Kuhns	585	1	585.00
1/27/2024	Follow on emails with White and Case re open Board Observer questions (.4); review Form 10 and send questions re same to White and Case (.5); set up call with A. Colodny re same and final distribution issues (.1)	Joyce A. Kuhns	585	1	585.00
1/29/2024	Call with A. Colodny re distribution issues (.4); review conforming plan re same (.6)	Joyce A. Kuhns	585	1	585.00

INVOICE DETAILS
TIMEKEEPER SUMMARY FOR THIS MATTER

<u>Timekeeper</u>	<u>Timekeeper Category</u>	<u>Hourly rate</u>	<u>Hours</u>	<u>Amount</u>
Jason A. Nagi	Attorney	\$550/hr	10.6	\$4,950.00
Jason A. Nagi	Attorney	\$605/hr	1.6	\$936.00
Joyce A. Kuhns	Attorney	\$530/hr	80.3	\$42,559.00
Joyce A. Kuhns	Attorney	\$585/hr	19.2	\$11,232.00
Leslie R. Horowitz	Attorney	\$570/hr	4.8	\$2,736.00
Total:			111.9	\$62,413.00
Matter Total				\$62,413.00